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9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA

11 IN RE: SOCIAL MEDIA ADOLESCENT
12 ADDICTION/PERSONAL INJURY
13 PRODUCTS LIABILITY LITIGATION

MDL No. 3047

Case No. 4:22-md-3047-YGR

14 This Document Relates to:
15 ALL ACTIONS

**TEMPORARY SEALING MOTION RE:
PLAINTIFFS' RESPONSE TO
DEFENDANTS' MOTION TO
EXCLUDE GENERAL CAUSATION
TESTIMONY OF PLAINTIFFS'
EXPERTS**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

Pursuant to the Court's Order Setting Sealing Procedures (ECF No. 341), Plaintiffs submit this Temporary Sealing Motion requesting to file under seal portions of Plaintiffs' Response to Defendants' Motion to Exclude General Causation Testimony of Plaintiffs' Experts and related exhibits. The reasons for sealing (if any) will be addressed in a forthcoming omnibus stipulation or omnibus motion.

Docket No.	Document	Whether document contains a party's Confidential Information
ECF No. 2405-3	Portions of Plaintiffs' Response to Defendants' Motion to Exclude General Causation Testimony of Plaintiffs' Experts	Temporarily filing under seal because document contains information that Meta, TikTok, Snap, or Google Defendants may consider to be confidential
ECF No. 2405-4	Ex. 1 (JCCP Deposition of A. Lembke)	Temporarily filing under seal because document contains information that Meta, TikTok, Snap, or Google Defendants may consider to be confidential
ECF No. 2405-5	Ex. 2 (JCCP Deposition of E. Telzer)	Temporarily filing under seal because document contains information that Meta, TikTok, Snap, or Google Defendants may consider to be confidential
ECF No. 2405-6	Ex. 3 (MDL Deposition of M. Prinstein)	Temporarily filing under seal because document contains information that Meta Defendants may consider to be confidential
ECF No. 2405-7	Ex. 4 (MDL Deposition of B. Zicherman)	Temporarily filing under seal because document contains information that Meta Defendants may consider to be confidential
ECF No. 2405-8	Ex. 5 (JCCP Deposition of R. Mojtabai)	Temporarily filing under seal because document contains information that Meta, TikTok, Snap, or Google Defendants may consider to be confidential

Docket No.	Document	Whether document contains a party's Confidential Information
ECF No. 2405-9	Ex. 6 (Expert Rebuttal Report of R. Mojtabai)	Temporarily filing under seal because document contains information that Meta, TikTok, Snap, or Google Defendants may consider to be confidential
ECF No. 2405-10	Ex. 7 (Expert Rebuttal Report of A. Lembke)	Temporarily filing under seal because document contains information that Meta, TikTok, Snap, or Google Defendants may consider to be confidential
ECF No. 2405-11	Ex. 8 (Expert Report of B. Zicherman)	Temporarily filing under seal because document contains information that Meta Defendants may consider to be confidential
ECF No. 2405-13	Ex. 10 (Expert Report of A. Lembke)	Temporarily filing under seal because document contains information that Meta, TikTok, Snap, or Google Defendants may consider to be confidential
ECF No. 2405-14	Ex. 11 (Expert Rebuttal Report of D. Christakis)	Temporarily filing under seal because document contains information that Meta, TikTok, Snap, or Google Defendants may consider to be confidential
ECF No. 2405-15	Ex. 12 (Expert Report of M. Prinstein)	Temporarily filing under seal because document contains information that Meta Defendants may consider to be confidential
ECF No. 2405-16	Ex. 13 (Expert Report of R. Mojtabai)	Temporarily filing under seal because document contains information that Meta, TikTok, Snap, or Google Defendants may consider to be confidential

Docket No.	Document	Whether document contains a party's Confidential Information
ECF No. 2405-17	Ex. 14 (Expert Rebuttal Report of B. Zicherman)	Temporarily filing under seal because document contains information that Meta Defendants may consider to be confidential
ECF No. 2405-18	Ex. 15 (Expert Report of D. Christakis)	Temporarily filing under seal because document contains information that Meta, TikTok, Snap, or Google Defendants may consider to be confidential
ECF No. 2405-19	Ex. 16 (JCCP Deposition of D. Cingel)	Temporarily filing under seal because document contains information that Meta, TikTok, Snap, or Google Defendants may consider to be confidential
ECF No. 2405-20	Ex. 17 (JCCP Deposition of J. Twenge)	Temporarily filing under seal because document contains information that Meta, TikTok, Snap, or Google Defendants may consider to be confidential
ECF No. 2405-21	Ex. 18 (MDL Deposition of A. Lembke)	Temporarily filing under seal because document contains information that Meta, TikTok, Snap, or Google Defendants may consider to be confidential
ECF No. 2405-22	Ex. 19 (MDL Deposition of L. Hale)	Temporarily filing under seal because document contains information that Meta Defendants may consider to be confidential
ECF No. 2405-23	Ex. 20 (Expert Rebuttal Report of J. Twenge)	Temporarily filing under seal because document contains information that Meta, TikTok, Snap, or Google Defendants may consider to be confidential

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ECF No. 2405-27	Ex. 24 (JCCP Deposition of D. Christakis)	Temporarily filing under seal because document contains information that Meta, TikTok, Snap, or Google Defendants may consider to be confidential
ECF No. 2405-29	Ex. 26 (Expert Rebuttal Report of M. Prinstein)	Temporarily filing under seal because document contains information that Meta Defendants may consider to be confidential
ECF No. 2405-30	Ex. 27 (JCCP Deposition of I. Gotlib)	Temporarily filing under seal because document contains information that Meta, TikTok, Snap, or Google Defendants may consider to be confidential
ECF No. 2405-31	Ex. 28 (MDL Deposition of S. Buka)	Temporarily filing under seal because document contains information that Meta, TikTok, Snap, or Google Defendants may consider to be confidential
ECF No. 2405-32	Ex. 29 (MDL Deposition of R. Mojtabai)	Temporarily filing under seal because document contains information that Meta, TikTok, Snap, or Google Defendants may consider to be confidential
ECF No. 2405-33	Ex. 30 (JCCP Deposition of S. Murray)	Temporarily filing under seal because document contains information that Meta, TikTok, Snap, or Google Defendants may consider to be confidential
ECF No. 2405-35	Ex. 32 (Expert Report of S. Murray)	Temporarily filing under seal because document contains information that Meta, TikTok, Snap, or Google Defendants may consider to be confidential

Docket No.	Document	Whether document contains a party's Confidential Information
ECF No. 2405-39	Ex. 36 (Expert Report of K. Becker)	Temporarily filing under seal because document contains information that Meta, TikTok, Snap, or Google Defendants may consider to be confidential
ECF No. 2405-41	Ex. 38 (Ex. 35 to the JCCP Deposition of D. Christakis)	Temporarily filing under seal because document contains information that Meta, TikTok, Snap, or Google Defendants may consider to be confidential
ECF No. 2405-43	Ex. 40 (Ex. 4 to the MDL Deposition of D. Christakis)	Temporarily filing under seal because document contains information that Meta, TikTok, Snap, or Google Defendants may consider to be confidential
ECF No. 2405-44	Ex. 41 (MDL Deposition of D. Christakis)	Temporarily filing under seal because document contains information that Meta, TikTok, Snap, or Google Defendants may consider to be confidential
ECF No. 2405-53	Ex. 50 (Expert Report of D. Cingel)	Temporarily filing under seal because document contains information that Meta, TikTok, Snap, or Google Defendants may consider to be confidential
ECF No. 2405-54	Ex. 51 (Expert Report of G. Goldfield)	Temporarily filing under seal because document contains information that Meta, TikTok, Snap, or Google Defendants may consider to be confidential
ECF No. 2405-55	Ex. 52 (MDL Deposition of G. Goldfield)	Temporarily filing under seal because document contains information that Meta, TikTok, Snap, or Google Defendants may consider to be confidential

Docket No.	Document	Whether document contains a party's Confidential Information
ECF No. 2405-56	Ex. 53 (JCCP Deposition of G. Goldfield)	Temporarily filing under seal because document contains information that Meta, TikTok, Snap, or Google Defendants may consider to be confidential
ECF No. 2405-59	Ex. 56 (Expert Report of R. Auerbach)	Temporarily filing under seal because document contains information that Meta, TikTok, Snap, or Google Defendants may consider to be confidential
ECF No. 2405-61	Ex. 58 (MDL Deposition of S. Murray)	Temporarily filing under seal because document contains information that Meta, TikTok, Snap, or Google Defendants may consider to be confidential
ECF No. 2405-62	Ex. 59 (Expert Rebuttal Report of S. Murray)	Temporarily filing under seal because document contains information that Meta, TikTok, Snap, or Google Defendants may consider to be confidential
ECF No. 2405-63	Ex. 60 (Expert Report of T. Schwartz)	Temporarily filing under seal because document contains information that Meta, TikTok, Snap, or Google Defendants may consider to be confidential
ECF No. 2405-64	Ex. 61 (Ex. 5 to the MDL Deposition of S. Murray)	Temporarily filing under seal because document contains information that Meta, TikTok, Snap, or Google Defendants may consider to be confidential
ECF No. 2405-65	Ex. 62 (Expert Report of E. Telzer)	Temporarily filing under seal because document contains information that Meta, TikTok, Snap, or Google Defendants may consider to be confidential

Docket No.	Document	Whether document contains a party's Confidential Information
ECF No. 2405-66	Ex. 63 (Expert Rebuttal Report of E. Telzer)	Temporarily filing under seal because document contains information that Meta, TikTok, Snap, or Google Defendants may consider to be confidential
ECF No. 2405-70	Ex. 67 (META3047MDL-020-00082810)	Temporarily filing under seal because document contains information that Meta Defendants may consider to be confidential
ECF No. 2405-71	Ex. 68 (MDL Deposition of E. Telzer)	Temporarily filing under seal because document contains information that Meta, TikTok, Snap, or Google Defendants may consider to be confidential
ECF No. 2405-78	Ex. 75 (MDL Deposition of E. Telzer)	Temporarily filing under seal because document contains information that Meta, TikTok, Snap, or Google Defendants may consider to be confidential
ECF No. 2405-79	Ex. 76 (MDL Deposition of J. Twenge)	Temporarily filing under seal because document contains information that Meta, TikTok, Snap, or Google Defendants may consider to be confidential
ECF No. 2405-81	Ex. 78 (Expert Report of S. Hoover)	Temporarily filing under seal because document contains information that Meta, TikTok, Snap, or Google Defendants may consider to be confidential
ECF No. 2405-82	Ex. 79 (MDL Deposition of S. Hoover)	Temporarily filing under seal because document contains information that Meta, TikTok, Snap, or Google Defendants may consider to be confidential

Docket No.	Document	Whether document contains a party's Confidential Information
ECF No. 2405-83	Ex. 80 (Expert Rebuttal Report of S. Hoover)	Temporarily filing under seal because document contains information that Meta, TikTok, Snap, or Google Defendants may consider to be confidential
ECF No. 2405-90	Ex. 87 (Rebuttal Trial Report of L. Hale)	Temporarily filing under seal because document contains information that Meta Defendants may consider to be confidential
ECF No. 2405-92	Ex. 89 (META3047MDL-111-00371250)	Temporarily filing under seal because document contains information that Meta Defendants may consider to be confidential
ECF No. 2405-93	Ex. 90 (MDL Deposition of A. Béjar)	Temporarily filing under seal because document contains information that Meta Defendants may consider to be confidential
ECF No. 2405-94	Ex. 91 (Ex. 8 to the MDL Deposition of A. Béjar)	Temporarily filing under seal because document contains information that Meta Defendants may consider to be confidential
ECF No. 2405-95	Ex. 92 (11/7/25 Non-Retained Expert Disclosures)	Temporarily filing under seal because document contains information that Meta, TikTok, Snap, or Google Defendants may consider to be confidential
ECF No. 2405-96	Ex. 93 (JCCP Deposition of A. Béjar)	Temporarily filing under seal because document contains information that Meta Defendants may consider to be confidential
ECF No. 2405-97	Ex. 94 (Ex. 12 to the MDL Deposition of A. Béjar)	Temporarily filing under seal because document contains information that Meta Defendants may consider to be confidential

Docket No.	Document	Whether document contains a party's Confidential Information
ECF No. 2405-98	Ex. 95 (Ex. 13 to the MDL Deposition of A. Béjar)	Temporarily filing under seal because document contains information that Meta Defendants may consider to be confidential
ECF No. 2405-100	Ex. 97 (MDL Deposition of R. Auerbach)	Temporarily filing under seal because document contains information that Meta, TikTok, Snap, or Google Defendants may consider to be confidential

DATED: November 7, 2025

Respectfully submitted,

/s/ Lexi J. Hazam

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